

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Tiffany S. Newkirk	:
	: Chapter 13
Debtor	:
	:
V.	: No: 18-16160-ELF
	:
Pennsylvania Housing Finance Agency	:
	: Adversary No.
Defendant	:

COMPLAINT TO DETERMINE SECURED STATUS PURSUANT TO
11 U.S.C. 506

1. Debtor filed for relief under Title 11, Chapter 13 on September 17, 2018.

2. Debtor owns the real estate located at 2913 N. 21st Street Philadelphia, PA 19132.

3. Debtor avers that the home had a fair market value of \$41,900.00 based on values of surrounding homes at the time of filing.

4. Debtor has a first mortgage with Ditech in the approximate amount of \$48,619.22 (Claim 2-1).

5. Debtor has a second mortgage with Pennsylvania Housing Finance Agency in the approximate amount of \$7,796.57 (Claim 4-1).

6. Debtor has a Municipal water/sewer lien in the amount of \$8,027.25 (Claim 5-1) and a second Municipal lien in the amount of \$112.00 (Claim 7-1).

7. As a result, there is no equity for the monies for the lien held by the Pennsylvania Housing Finance Agency.

WHEREFORE, Debtor, Tiffany S. Newkirk, by her attorney David M.Offen, Esquire, respectfully requests that this Honorable Court enter an Order determining the second mortgage of Pennsylvania Housing Finance Agency to be avoided and to be treated as a unsecured claim.

Dated:4/1/19

/s/ David M. Offen
David M. Offen
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